

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK**

JIA SHENG,

Plaintiff,

v.

M&T BANK CORPORATION, and
MANUFACTURERS & TRADERS TRUST
COMPANY d/b/a M&T BANK,

Defendants.

No. 12 Civ. 01103 (HBS)

**DECLARATION OF GEORGE D. VALLAS IN SUPPORT OF PLAINTIFF'S
MOTION REQUESTING THAT THE COURT TAKE JUDICIAL NOTICE OF
DEFENDANTS' FINANCIAL INFORMATION
DISCLOSED TO THE PUBLIC AND THE SEC**

George D. Vallas, of full age, being duly sworn according to law, deposes and says:

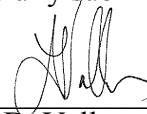
1. I am an attorney of the Ottinger Firm, P.C., counsel for Plaintiff Jia Sheng in the above-entitled action against Defendants M&T Bank Corporation and Manufacturers and Traders Trust Company d/b/a M&T Bank (collectively "Defendants" or "M&T").

2. I make this declaration to put before the Court a document relevant to Plaintiff's Motion Requesting that the Court take Judicial Notice of Defendants' Financial Information Disclosed to the Public and the federal Security and Exchange Commission ("SEC").

3. Specifically, attached hereto as **Exhibit A**, please find a true and correct copy of a Form 10-K filed with the SEC by M&T on February 25, 2013.

DATED: October 3, 2014
New York, New York

Respectfully submitted,



George D. Vallas